

# **EXHIBIT 11**

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

-----  
SYNGENTA CROP ) Civil Action No.  
PROTECTION, LLC )  
Plaintiff ) 1:15-cv-274  
vs. )  
WILLOWOOD, LLC, )  
WILLOWOOD USA, LLC, )  
WILLOWOOD AZOXYSTROBIN, LLC )  
and WILLOWOOD LIMITED )  
Defendants )  
-----

- ATTORNEYS' EYES ONLY -

Videotaped Deposition of Vijay Mundhra

Washington, D.C.

August 23, 2016

10:38 a.m.

Reported by: Bonnie L. Russo

Job No. 2351718

1           A.       I'm not sure about it.

2           Q.       Now, was Rajesh involved in any of  
3           the regulatory activities on behalf of  
4           Willowood involving azoxystrobin?

5           A.       He's not directly involved in  
6           regulatory activities. His role is only to  
7           provide the information related to  
8           manufacturing process that he receives through  
9           Sophia or Mr. Shen from China.

10          Q.       If I understand that correctly,  
11          Rajesh receives information regarding  
12          manufacturing processes from individuals such  
13          as Sophia or Mr. Shen and passes it along to  
14          Willowood's regulatory consultants.

15          A.       Yes.

16          Q.       Can you tell me a little bit about  
17          Rajesh's other responsibilities?

18          A.       He does the regulatory work at  
19          Willowood Limited to help register products  
20          with the different -- the authorities in  
21          different countries.

22          Q.       And he would have been a point of

1 contact for Willowood in connection with  
2 azoxystrobin registrations; is that right?

3 A. Point of contact with whom?

4 Q. Rajesh would have been a point of  
5 contact between Willowood and its regulatory  
6 consultants regarding azoxystrobin  
7 registrations with the EPA, correct?

8 A. The EPA consultants contact him to  
9 ask for the information they need.

10 Q. That would include an entity called  
11 Pyxis Regulatory Consulting, correct?

12 A. Yes.

13 Q. So Rajesh had communication was  
14 Pyxis -- individuals at Pyxis regarding process  
15 information provided to Pyxis; is that right?

16 A. He simply passed on the process  
17 information that was received from China to  
18 Pyxis.

19 Q. Now, we talked about Sophia.

20 What is her role at Willowood?

21 A. She usually collects this kind of  
22 information from factories related to some

1 documents that may be required about  
2 manufacturing process or...

3 Q. So Sophia, is she also involved in  
4 regulatory work on behalf of Willowood?

5 A. Not technically exactly, but she  
6 helps coordinate things, collects some  
7 documents from local government or  
8 manufacturers.

9 Q. Sophia collects information  
10 regarding manufacturing processes from the  
11 factories that carry out those processes; is  
12 that right?

13 A. Yes.

14 Q. Okay. She would have been -- strike  
15 that.

16 Sophia would have been the  
17 individual who would have collected information  
18 regarding how Willowood's azoxystrobin  
19 technical is manufactured, correct?

20 A. I believe so. Because Mr. Shen is  
21 the one who communicates with the factory and  
22 then would ask Sophia to follow up.

1           Q.       So Sophia would interface at times  
2       with the factories and the workers at those  
3       factories regarding the processes used to  
4       manufacture azoxystrobin technical, correct?

5           A.       She will follow up with the  
6       representative of the factory to get the  
7       process.

8           Q.       That information about the  
9       manufacturing process will be provided to  
10      Rajesh; is that right?

11          A.       Then she would receive it and  
12      provide it to Mr. Shen. And then either Mr.  
13      Shen or Sophia would pass it on too.

14          Q.       Is it fair to say that Sophia would  
15      pass along the process information to Rajesh  
16      via e-mail?

17          A.       Probably, yes.

18          Q.       Is it possible that she would pass  
19      along process-related information to Rajesh via  
20      chat applications like QQ?

21          A.       I'm not sure at the moment.

22          Q.       Now, we talked about chat